

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

IN RE: POTASH ANTITRUST LITIGATION  
(II)

MDL Docket No. 1996

THIS DOCUMENT APPLIES TO:

Civil No. 1:08-cv-06910

ALL DIRECT PURCHASER CLASS ACTIONS

Hon. Ruben Castillo

**DIRECT PURCHASER PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS  
SETTLEMENT WITH DEFENDANTS AGRIUM, MOSAIC AND PCS,  
AND FOR APPROVAL OF PLAN OF ALLOCATION**

Direct Purchaser Plaintiffs respectfully move this Court to enter an Order granting final approval of their class action settlement with defendants Agrium, Inc. and Agrium U.S., Inc., The Mosaic Company, n/k/a MOS Holdings Inc. and Mosaic Crop Nutrition, LLC, and Potash Corporation of Saskatchewan Inc. and PCS Sales (USA), Inc., and approval of plan of allocation for this case, and for such other and further relief as this Court deems proper.

This motion is based on the supporting Declarations of W. Joseph Bruckner and Eric Robin, filed concurrently with this motion, upon the accompanying memorandum, and the records, pleadings, and papers filed in this action, and such argument as may be presented to the Court at the fairness hearing.

Dated: June 5, 2013

Respectfully submitted,

*/s/ Steven A. Hart*

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*/s/ W. Joseph Bruckner*

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